

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: DARRELL R. HIPPLER	:	CHAPTER 13
Debtor	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
DARRELL R. HIPPLER	:	
Respondent	:	CASE NO. 1-24-bk-00264

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 16th day of May 2024 comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. Failure to properly state the minimum amount to be paid to unsecured creditors in Section 1.A.4. of the plan, as required by the Mean Test (should be \$33,835.00).
2. The Trustee avers that debtor(s)' plan is not feasible based upon the following:
 - a. Insufficient Monthly Net Income as indicated on Schedules I and J.
 - b. Secured claims not in plan (Claim 3-1 arrears).
3. The debtor has not provided the Trustee with information needed in order for the Trustee to comply with § 1302(b)(6).

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/Douglas R. Roeder
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 16th day of May 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

AMY L OWEN
NICKLAS & SNYDER
183 LINCOLN WAY EAST
CHAMBERSBURG, PA 17201-

/s/Tammy Life
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee